
DELIVERED ELECTRONICALLY

April 14, 2023

Ms. Shireen Hart
Primmer, Piper, Eggleston & Cramer, PC
30 Main Street
Suite 500, P.O. Box 1489
Burlington, VT 05402

RE: Docket No. GMCB-006-23con, Proposed Purchase of 100% Ownership Interest in Silver Pines Partners, LLC

Dear Ms. Hart:

Thank you for your letter of April 4, 2023, requesting a jurisdictional determination regarding Integrative Life Network, LLC's intent to purchase 100% of the ownership interest in Silver Pines Partners, LLC (Silver Pines) from the current owners, twenty-four (24) individuals, trusts and LLCs that own membership interests in Silver Pines. Your letter further states that Silver Pines would become a wholly-owned subsidiary of Integrative Life Network (ILN).

The Board requires additional information to make the requested determination. Please provide all sections of the Membership Interest Purchase Agreement (MIPA) that describe the structure of the transaction. Please do not include the personal identity of the sellers, specific information about amounts payable or amounts receivable, Tax Identification Numbers, Employer Identification Numbers, Social Security Numbers, or Protected Health Information.

Please also provide a detailed explanation of the transaction reflected in the MIPA. Finally, please provide analysis of the proposed transaction in relation to 18 V.S.A. § 9434(a)(3).

The 30-day review period for the jurisdictional determination is tolled until your response to this request for additional information is received.

Please send an electronic copy attached to an e-mail to me at donna.jerry@vermont.gov and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.



If you have any questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

s/ Donna Jerry

Senior Health Policy Analyst
Green Mountain Care Board

cc. Laura Beliveau, Staff Attorney, GMCB

